

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**JATONYA MULDROW,**

PLAINTIFF,

**V.**

**CITY OF ST. LOUIS, et al.**

DEFENDANTS.

**Case No.: 4:18-cv-02150AGF**

**DEFENDANTS' REPLY IN OPPOSITION TO PLAINTIFF'S MOTION  
TO STRIKE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

COME NOW the Defendants by and through counsel, and for their Reply In Opposition To Plaintiff's Motion to Strike Defendants' Motion for Summary Judgment state as follows.

1. Defendants' Motion for Summary Judgment, Memorandum in Support, and Statement of Uncontroverted Material Facts were filed on June 2, 2020, one day past the current Case Management Order's deadline of June 1, 2020. Docs. 32, 37-39.

2. On May 29, 2020, Counsel for Defendants sought Plaintiff's consent to extend the Case Management Order's dispositive motion deadline from June 1, 2020 to July 1, 2020 for a number of good faith reasons that posed no potential prejudice to Plaintiff. See Doc. 41, Ex. A. Within one hour of Plaintiff advising she would not consent to the extension, Counsel for Defendants filed their Motion to Amend Second Amended Case Management Order. Doc. 35. Counsel for Defendants made every effort to file their Motion for Summary Judgment, Memorandum in Support, and Statement of Uncontroverted Material Facts on June 1, as further evidenced by their Supplemental Motion to Amend Second Amended Case Management Order and Motion for Leave to File Out of Time. Docs. 36 and 41.

3. In opposition to Plaintiff's Motion to Strike Defendants' Motion for Summary Judgment, Defendants hereby reference and incorporate all facts and arguments in their Motion for Amendment to the Second Amended Case Management Order (Doc. 35), Supplemental Motion for Amendment to Second Amended Case Management Order (Doc. 36) and Motion for Leave to File Out of Time (Doc. 41).

WHEREFORE, the Defendants request the Court deny Plaintiff's Motion to Strike, accept Defendants Motion for Summary Judgment, Memorandum In Support, and Statement of Uncontroverted Material Facts as filed on June 2, 2020 as further set forth in Defendants' Motion for Leave to File Out of Time (Doc. 41), and for such further relief as the Court deems just and necessary under the facts and circumstances of this case.

Respectfully submitted,  
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